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Filing date: **10/05/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91201083
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	ARYN M EMERT COWAN LIEBOWITZ AND LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES ame@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Aryn M. Emert
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Signature	/Aryn M. Emert/
Date	10/05/2012
Attachments	MOCS - TWINS SPECIAL - 10-05-12.pdf (3 pages)(10869 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/116,041
Filed: August 25, 2010
For Mark: TWINS (and Design)
Published in the Official Gazette: February 15, 2011

MINNESOTA TWINS, LLC,	X	
Opposer,	:	Opposition No. 91201083
v.	:	
TWINS SPECIAL LLC,	X	
Applicant.	:	

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order to suspend the proceedings in this matter for a period of three (3) months, until **January 5, 2013**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full

period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
October 5, 2012

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Aryn M. Emert/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on October 5, 2012, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, David M. Kohn, Lewis Kohn & Fitzwilliam LLP, 10935 Vista Sorrento Parkway, Suite 370, San Diego, California 92130.

/Aryn M. Emert /
Aryn M. Emert